

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 16-10094-LTS
)	
ROSS MCLELLAN,)	
)	
Defendant.)	
_____)	

**GOVERNMENT’S ASSENTED-TO MOTION TO EXTEND TIME TO FILE
RESPONSE TO DEFENDANT’S MOTION FOR RULE 15 DEPOSITIONS**

The United States respectfully requests that this Court extend the time for the filing of its Response to Defendant’s Motion for Rule 15 Depositions to Monday, March 5, 2018. *See* Dkt. 296 (filed under seal). In support of its request for five extra days to respond to McLellan’s motion, the government states as follows:

1. Counsel for the government, AUSA Stephen Frank, is currently in the middle of a complex fraud trial in front of Judge Richard Stearns, *see United States v. Ackerly et al.*, 1:16-cr-10233 (D. Mass.).

2. The government recently responded to McLellan’s motion to sever count 6, Dkt. 298, which was filed one day before the motion for the Rule 15 depositions. *See* Dkt. 292.

3. Counsel for McLellan assets to the granting of this motion.

Accordingly, the government requests that the Court grant the requested motion and permit the government to file its response by Monday, March 5, 2018, rather than Wednesday, February 28, 2018.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on February 27, 2018, this document was filed through the ECF system,
which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ William E. Johnston
WILLIAM E. JOHNSTON